

WorldCom, Inc.
1133 19th Street, N.W.
Washington, D.C. 20036

June 20, 2002

EX PARTE

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98; Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147

Dear Ms. Dortch:

Yesterday, I met with Julie Veach, Jeremy Miller, Elizabeth Yockus, Oscar Lumen, Ty Cottrill, Dennis Johnson, Jon Reel, Ian Dillner, and Robb Tanner, all of the Wireline Competition Bureau. Mark Schneider, outside counsel to WorldCom, also attended. During the meeting, we discussed the Commission's temporary restriction on conversions of existing special access arrangements to combinations of unbundled loop and transport network elements.

We explained that the purported grounds for that temporary restriction - the risk of a sudden and precipitous decline in incumbent local exchange carrier special access revenue that might (allegedly) impact universal service - are not implicated by orders for "new" loop-transport combinations. We pointed out that any extension of the use restrictions to "new" combinations would seriously undercut arguments made by the Commission to the D.C Circuit Court of Appeals. We urged the Commission to focus its energies on several pressing, unresolved issues related to unbundled loop-transport combinations, particularly WorldCom's petition for waiver.

Sincerely,

_____/s/____

Henry G. Hultquist
Associate Counsel